

UNITED STATE DISTRICT COURT
DISTRICT OF RHODE ISLAND

KATHRYN NARCISI
Plaintiff

v.

TURTLEBOY DIGITAL MARKETING, LLC
D/B/A TURTLEBOYSports.COM
Defendants

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: C.A. No.: 2019-CV-00329-JJM-PAS
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MOTION TO ALLOW TIME
TO FILE MOTION FOR REMAND
WITH SUPPORTING BRIEF

Now herein comes, Edward M. Pepe, Esq., of Moretti, Perlow and Bonin Law Offices, and hereby requests that this court allow forty-five days for counsel to file a Motion for Remand with Supporting Brief. Such time is needed because: 1) counsel has recently been retained to represent plaintiff; and 2) plaintiff is challenging defendant's Notice of Removal and/or Amended Notice of Removal based upon a lack of subject matter jurisdiction pursuant to 28 U.S.C. §1332 as the amount in controversy does not exceed the sum or value of \$75,000 exclusive of interests and costs; and 3) may challenge procedural defects in defendant's Notice of Removal and/or Amended Notice of Removal; and 4) any other legal theories based upon further research.

Plaintiff by Her Attorneys,
MORETTI, PERLOW AND BONIN LAW OFFICES

/s/ Edward M. Pepe, Esq.
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CERTIFICATE OF SERVICE

I certify that the within document was electronically filed with the clerk of the court on August 1, 2019, and that it is available for viewing and downloading from the Court's ECF system. Service by electronic means has been effectuated on the following counsel of record:

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Cooperating counsel,
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF RHODE ISLAND

/s/ Deborah J. Ullrich